

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement;¹ Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

No. 25-cv-1963-MEF-MAH

[PROPOSED] ORDER

This matter is before the Court on the Petitioner's Motion for Preliminary Injunction. Upon review of the Petitioner's submissions, argument, and evidence, and applicable authority, the motion is GRANTED.

IT IS HEREBY ORDERED that:

¹ Respondent Yolanda Pittman, in her official capacity as Warden of Elizabeth Contact Detention Facility, will be added.

- (1) Respondents shall release Petitioner Mahmoud Khalil for the pendency of this litigation;
- (2) Respondent Secretary of State Marco Rubio's determination that Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, the Foreign Policy Ground, applies to Petitioner Mahmoud Khalil is preliminarily enjoined for the pendency of this litigation; and
- (3) Respondents are enjoined from enforcing their Policy of arresting, detaining, and removing noncitizens who engage in constitutionally protected expressive activity in the United States in support of Palestinian rights or critical of Israel for the pendency of this litigation.

IT IS SO ORDERED, this _____ day of _____, 2025.

Hon. Michael E. Farbiarz, U.S.D.J.